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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE PEDRO NAVA,

Defendant.

CASE NO. 2:24-CR-0054-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: January 24, 2025
TIME: 9:00 a.m.
COURT: Hon. Dena Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on January 24, 2025.
2. By this stipulation, defendant now moves to continue the status conference until April 4, 2025, and to exclude time between January 24, 2025, and April 4, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes reports, audio and video recordings, and other documents. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant desires additional time to review discovery, conduct additional investigation, meet and confer with the government, and otherwise prepare for trial.

1 c) The parties have met and conferred regarding potential case resolution, and those
2 conversations are ongoing.

3 d) Both parties are conducting additional investigation and need additional time to
4 complete the investigation before resolving the case or setting a trial date.

5 e) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny him/her the reasonable time necessary for effective preparation, taking
7 into account the exercise of due diligence.

8 f) The government joins in this request.

9 g) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of January 24, 2025 to April 4, 2025,
14 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
15 because it results from a continuance granted by the Court at defendant's request on the basis of
16 the Court's finding that the ends of justice served by taking such action outweigh the best interest
17 of the public and the defendant in a speedy trial.

18 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
19 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
20 must commence.

21 IT IS SO STIPULATED.

22 Dated: January 17, 2025

23 MICHELE BECKWITH
Acting United States Attorney

24
25 /s/ EMILY G. SAUVAGEAU
EMILY G. SAUVAGEAU
26 Assistant United States Attorney
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Dated: January 17, 2025

/s/ ALLEN SAWYER
ALLEN SAWYER
GREG DAVENPORT
Counsel for Defendant
JOSE PEDRO NAVA

ORDER

Good cause appearing, the parties stipulated request to continue is GRANTED.

Accordingly, the status conference set for January 24, 2025, is VACATED and RESET for April 4, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period of January 24, 2025 to April 4, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: January 17, 2025



Dena Coggins
United States District Judge